recommend that DOE select a cost-effective preferred alternative (not necessarily limited to the ones already presented in this DEIS). This alternative must comply with the Idaho Settlement Agreement stipulations to remove and treat the sodium based wastes (SBW), and calcine it so that it is road-ready for shipment out of Idaho by 2035.

83-21 IX.A(4) 14. DOE should provide an estimate of the additional unnecessary cost for the multi-color layout of this DEIS, and of the resulting final EIS. How much of this publication cost could be saved by issuing only the Summary in this way, and printing the rest of the document without the color layouts, as in other DEIS/EISs?

83-22 XI(1) 15. A final comment is based upon an independent evaluation of scientific and technical issues related to environmental remediation of defense waste sites managed by DOE. An NRC (NAS) 1996 report on governmental research and development operations entitled "Barriers to Science" reported a variety of problems. A number of these deficiencies appear to be applicable to the DOE, including:

1. Planning is driven by existing organizational structures, rather than establishing special groups to deal with the problems to be solved.
2. Commitments are often made without adequately considering technical feasibility, cost & schedule.
3. There is often an innate inability to look at more than one alternative at a time.
4. Priorities are often driven by narrow interpretations of regulations rather than regulation's purpose.
5. Production of documents often seems to be an end in itself, rather than a useful means to achieve an organizational or technical goal.
6. There often is a lack of organizational coordination.
7. There is an exclusionary "not-invented-here" syndrome at individual sites.

In summary, there appears to be some slight measures of improvement in some areas and programs of the DOE. However, much of the problems cited above are ingrained in the DOE culture. The DOE should challenge itself to make substantial progress in eliminating or at least reducing the above-noted problems. This is especially necessary for DOE/ID if INEEL is to truly be recognized as the lead laboratory for environmental remediation. And nuclear research.

LAJ: HLW-DEIS rev.5

Very truly yours

R A Kenney

Richard A. Kenney
President Coalition 21

HLW & FD EIS PROJECT - AR/PF
Control # DC-84

April 18, 2000

TO: Thomas L. Wichmann, Document Manager
U.S. Department of Energy, Idaho Operations Office
850 Energy Drive, MS 1108
Idaho Falls, Idaho 83401-1563

RECEIVED APR 24 2000

FROM: Stephen D. Kruse
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Jackson Hole, Wyoming 83001-9437

SUBJ: Idaho HLW & FD EIS

84-1 IX.A(2) To all the ladies and gentlemen involved in researching and preparing the many documents for the preliminary stages of this Environmental Impact Statement (EIS) process for the Idaho High-level Waste and Facilities Disposition, I would express the thanks of the public you have served. Certainly, your many publications, news articles and public meetings have promoted public awareness. This public awareness, much more than public involvement, seems to have been your most beneficial task.

From the beginnings of my acquaintance with this *Draft* EIS, a personal disclaimer of ignorance and lack of fundamental knowledge was most suggestive in this land of technical giants. Hopefully a few of the questions which come through public comments will steer you more precisely toward your goals. Obviously for the general public, most of our time is devoted to slaying dragons in our own workplaces. Knowledge and experience gives us the ability to make and implement sound decisions. Appropriate, effective and inappropriate solutions for INEEL are not readily seen in a one-day tour.

Thus my comments will be more questions for your consideration and a few comments, as you prepare to slay this beast. If any questions and comments from the general public provoke thoughts, investigations, testing and insights toward your goal, then our public involvement will have had a positive result.

Just what are we trying to do?

Can we eliminate the entire problem here (meaning INEEL)?

If we transport a portion of the HLW to Hanford, are we passing the muck (i.e. buck)?

Can we take care of this problem once and for all? (or are we just making neat containers which must be dealt with at some time in the future, whatever the year?)
If **you** have to deal with this 75 years from now, what would **you** like to see?

How can we deal with this HLW with the least amount of handling?

Can the sodium-bearing liquid waste (SBW) be broken down, or go through some kind of evaporative process to reduce its total volume, rather than adding virgin materials (e.g. dolomite) thereby creating more total waste?

84-2 IX.P(6) Once we decide what we are going to do, procedures must be developed and followed. Follow procedure !!

Often the best solution is a combination of solutions. Most of the time just one solution does not take care of everything. Some items go to a Waste Isolation Pilot Plant (WIPP), some to Hanford, most are processed here.

Where is the best place to process HLW?

If transportation is recommended, what is the safest mode of transport?

If transportation is by rail, how many cars maximum should be concentrated on one train?

84-3 VIII.A(5) Trucking may be best to WIPP, since each load may be transported when ready, rather than storing processed materials waiting on a trainload.

84-4 VIII.A(2) What happens if there is an accident? What kind of contamination is possible? probable? What are the relative health risks to our workers, the general public, the environment? We need to develop an objective rating scale for each of the above?

84-5 X(6) A well-written *Cost Analysis of Alternatives* has been published, and while cost is not the most significant factor, a solution so expensive that it is not funded is not a solution. Apparently the No Action option is the only option feasible at current funding levels. Reflect that the future cost of taking no action is often incalculable; if the environment is irreparably damaged, irreplaceable.

Here again the questions of "What if ...?" and "How do you ...? and "Why do you ...?" come to mind.

84-6 IX.D(6) Then again if the solutions are clear. Develop a plan, establish procedures, fund, and proceed.

84-7 VI(1) Whatever we can do now, do now! Implement other plans as they are formulated and approved.

Unless HLW will take care of itself over time without unnecessary risk, No Action will not be one of our chosen options.

84-8 II.B(1) Under "What if's...?" we need to be mindful of weather, potential seismic influences, i.e. things not within our control; think, plan, prepare.

For me, I still have much to learn. I wish you well.

HLW & FD
EIS PROJECT - AR/RF
Control # DOE
RECEIVED
MAY 15 2000

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April 18, 2000

Thomas Wichmann
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Please include these comments in the official hearing record for the DEIS - Idaho High-level Waste & Facilities Disposition.

I am greatly concerned about this enormous problem and I am pleased that the department is inviting public comments and suggestions. From my reading of the summary document I have the following observations, comments, and suggestions which I feel need to be considered in the final EIS document:

(1) The INEL should be cleaned up to the standards described in the "Clean Closure Alternative." I doubt very much if the DOE will be able to walk away by the latter years of this century — if ever.

85-1 IV.A(1) Plutonium, as we all know, has a half life which is twice as long as scientists estimate human occupation of North America, so I suggest that DOE or its successors, should acknowledge today that it's job most likely will never end — somebody is going to have

85-2 IX.D(2) to protect generations in the distant future from plutonium contamination.

(2) Present and future groundwater contamination is a serious problem, considering that the health of a major portion of the populace of the state is dependant on the Snake River Aquifer. You say that Iodine-129 levels exceed the standard by 11 times and that Strontium-90 levels exceed the standard by 19 times, that this is in the ground water and will exceed the standard. You also predict that materials left in place after closure will migrate to the aquifer and "public exposure could occur if people use the aquifer for drinking water and other domestic purposes." Are you serious? What else would the public use an aquifer for? The DOE must come to terms with the fact that they have seriously contaminated the aquifer already. In my opinion the #1 goal

85-3 III.A(1) of cleanup at INEL should be focused on cleaning up the water contamination

85-4 III.A (1) & preventing additional contamination. This is the most important problem and can't wait. How do you clean up a contaminated aquifer? This is even more pressing now that scientists at Los Alamos discovered that Pu travels much more easily and faster through water than had ever before been believed.

(3) I understand from reading this document that there seems to be no way that INEL high level waste will be leaving the state any time soon. At best you are saying that it might be "ready for shipment out" by 2035. So much for the stupid agreement which, as we all know, only gave the Navy the green light to continue to dump its SNF on the dumb spuds. You also admit that "it would be difficult to stop using the tank farm by 2015." Since you have admitted that the agreement isn't worth the

85-5 VII.D (1) paper it was signed on, why not fully plan this HLW cleanup schedule correctly and stop having the tail wag the dog. For instance, why are you bothering to go through this EIS process to choose an alternative to treat the waste now — before DOE identifies its criteria for the mythical long-term repository? You admit that "the lack of criteria

85-6 III.F.2 introduces some uncertainty that could affect design & operation of the treatment options." OK, so doesn't it make sense to decide the criteria first and then (2) come up with alternatives which would treat the waste to meet the criteria not the other way around?

(4) I see that DOE is up to it's old trick of word fabrication and smoke & mirrors. Let's see, how do we make INEL more acceptable to the

85-7 IX.D (1) public? — why add the word "environmental" & they'll all think it's safe. Ah! Now, let's see, we have all of this HLW & don't know what to do with it, but if we call it "waste incidental

85-9 IX.D (2) to reprocessing" then we can legally ship transuranic and then maybe we can slip it into New Mexico, they're almost as dumb as